

United States Bankruptcy Court for the:

District of Minnesota

Case number (if known): _____

Chapter you are filing under:

- ☐ Chapter 7
☒ Chapter 11
☐ Chapter 12
☐ Chapter 13

☐ Check if this is an
amended filing

Official Form 201

Voluntary Petition for Non-Individuals Filing for Bankruptcy

06/22

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Parke Opco, LLC d/b/a Subsurface Construction

2. All other names debtor used
in the last 8 years

Include any assumed names,
trade names, and *doing business*
as names

3. Debtor's federal Employer
Identification Number (EIN) 45-5308567

4. Debtor's address

Principal place of business

Mailing address, if different from principal place
of business

8350 201st Avenue NW

Number Street

Number Street

P.O. Box

Nowthen MN 55330

City State ZIP Code

City State ZIP Code

Location of principal assets, if different from
principal place of business

Anoka County

County

Number Street

City State ZIP Code

5. Debtor's website (URL)

6. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other. Specify: _____

Debtor Parke Opco, LLC d/b/a Subsurface Construction
Name
Case number (if known)

7. Describe debtor's business

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply:

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.

See <http://www.naics.com/search/>.
 237990

8. Under which chapter of the Bankruptcy Code is the debtor filing?

Check one:

- ☐ Chapter 7
☐ Chapter 9
☒ Chapter 11. Check all that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☒ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, and it chooses to proceed under Subchapter V of Chapter 11. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11 (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?

☒ No

☐ Yes. District _____ When _____ Case number _____
 MM / DD / YYYY
 District _____ When _____ Case number _____
 MM / DD / YYYY

If more than 2 cases, attach a separate list.

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?

☒ No

☐ Yes. Debtor _____ Relationship _____
 District _____ When _____
 Case number, if known _____
 MM / DD / YYYY

List all cases. If more than 1, attach a separate list.

Debtor Parke Opco, LLC d/b/a Subsurface Construction Case number (if known) _____
Name

11. Why is the case filed in *this* district?

Check all that apply:

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?

- ☒ No
- ☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

Why does the property need immediate attention? *(Check all that apply.)*

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.
What is the hazard? _____
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other _____

Where is the property?

Number _____ Street _____

City _____ State _____ ZIP Code _____

Is the property insured?

- ☐ No
- ☐ Yes. Insurance agency _____
- Contact name _____
- Phone _____

Statistical and administrative information

13. Debtor's estimation of available funds

Check one:

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000 | <input type="checkbox"/> 25,001-50,000 |
| <input type="checkbox"/> 50-99 | <input type="checkbox"/> 5,001-10,000 | <input type="checkbox"/> 50,001-100,000 |
| <input type="checkbox"/> 100-199 | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999 | | |

15. Estimated assets

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000 | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

Debtor Parke Opco, LLC d/b/a Subsurface Construction
Name

Case number (if known) _____

16. Estimated liabilities

- | | | |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000 | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 04/22/2024
MM / DD / YYYY

X /s/ Craig J. Morse

Signature of authorized representative of debtor

Craig J. Morse

Printed name

Title CEO

18. Signature of attorney

X /s/ Cameron Lallier

Signature of attorney for debtor

Date 04/22/2024

MM / DD / YYYY

Cameron Lallier

Printed name

Bassford Remele, A Professional Association

Firm name

100 South 5th Street 1500

Number Street

Minneapolis

City

MN

State

55402-1254

ZIP Code

612-376-1621

Contact phone

clallier@bassford.com

Email address

0393213

Bar number

MN

State

Fill in this information to identify the case:

Debtor name Parke Opco, LLC d/b/a Subsurface Construction

United States Bankruptcy Court for the: District of Minnesota

Case number (If known): _____

☐ Check if this is an amended filing

Official Form 204

Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	MidCountry Bank 7825 Washington Ave S #120 Minneapolis, MN, 55439				5,700,000.00	3,375,640.00	2,324,360.00
2	Internal Revenue Service PO Box 7346 Phildelphia, PA, 19101		Taxes & Other Government Units				225,000.00
3	Chase Visa 270 Park Avenue New York, NY, 10017		Credit Card Debt				99,000.00
4	Minnesota Unemployment Insurance PO Box 4629 St. Paul, MN, 55101						47,978.00
5	Beaudry Oil and Services 630 Proctor Avenue Elk River, MN, 55330		Suppliers or Vendors				40,000.00
6	Vermeer RDO Trust # 80-5800 PO Box 7160 Fargo, ND, 58106		Suppliers or Vendors				35,122.00
7	Western National PO Box 59184 Minneapolis, MN, 55459		Insurance				34,043.77
8	MN Dept of Revenue PO Box 64564 St. Paul, MN, 55164						19,616.00

Debtor Parke Opco, LLC d/b/a Subsurface Construction
Name

Case number (if known) _____

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	Super Products LLC 10220 New Decade Dr Pasadena, TX, 77507		Services				17,813.59
10	Blue Cross Blue Shield MN PO Box 860449 Minneapolis, MN, 55486						16,405.72
11	CenterPoint Claims Center 501 West 61st St Minneapolis, MN, 55419						10,981.67
12	Lethert, Skwira, Schultz & Co LLP 170 7th Place East St. Paul, MN, 55101		Services				10,000.00
13	BMO Bank PO Box 2045 Milwaukee, WI, 53201		Equipment Lease				8,618.00
14	De Lage Landen Financial Services, Inc. PO Box 41602 Phildelphia, PA, 19101						8,394.41
15	De Lage Landen Financial Services, Inc. PO Box 41602 Phildelphia, PA, 19101		Equipment Lease				7,327.71
16	Columbia Mngt Services 290 Congress Street Boston, MA, 02110		Services				6,973.00
17	Aaron Burquest 8350 201st Ave NW Nowthen, MN, 55330		Commercial Lease				4,500.00
18	Ayd Consulting 9800 Justen Trail N Grant, MN, 55115						3,200.00
19	JNR Adjustment Company PO Box 27070 Minneapolis, MN, 55427						2,222.52
20	Cambridge Apartments 320 Edgewood Ave N Golden Valley, MN, 55427		Commercial Lease				2,182.00

REVISED 12/15

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Parke Opco, LLC

Case No.

Debtor(s).

SIGNATURE DECLARATION


- ☒ PETITION, SCHEDULES & STATEMENTS
☐ CHAPTER 13 PLAN
☐ VOLUNTARY CONVERSION, SCHEDULES & STATEMENTS
☐ AMENDMENT TO PETITION, SCHEDULES & STATEMENTS
☐ MODIFIED CHAPTER 13 PLAN
☐ OTHER: PLEASE DESCRIBE: _____

I [We], the undersigned debtor(s) or authorized representative of the debtor, make the following declarations under penalty of perjury:

1. The information I have given my attorney for the electronically filed petition, statements, schedules, amendments, and/or chapter 13 plan, as indicated above, is true and correct;
2. The Social Security Number or Tax Identification Number I have given to my attorney for entry into the court's Case Management/Electronic Case Filing (CM/ECF) system as a part of the electronic commencement of the above-referenced case is true and correct;
3. **[individual debtors only]** If no Social Security Number was provided as described in paragraph 2 above, it is because I do not have a Social Security Number;
4. I consent to my attorney electronically filing with the United States Bankruptcy Court my petition, statements and schedules, amendments, and/or chapter 13 plan, as indicated above, together with a scanned image of this Signature Declaration;
5. My electronic signature contained on the documents filed with the Bankruptcy Court has the same effect as if it were my original signature on those documents; and
6. **[corporate and partnership debtors only]** I have been authorized to file this petition on behalf of the debtor.

Date: April 22, 2024

x


Signature of Debtor 1 or Authorized Representative

Craig Morse, CEO
Printed name of Debtor 1 or Authorized Representative

x

Signature of Debtor 2

Printed Name of Debtor 2

LOCAL FORM 1008-1

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Parke Opco, LLC

Case No. _____

Debtor(s).

PROOF OF AUTHORITY TO SIGN AND FILE PETITION

I, Craig J. Morse declare under penalty of perjury that I am the CEO of Parke OpCo, LLC, a Delaware limited liability company with its principal place of business at 8350 201st Avenue NW, Suite 100, Nowthen, MN 55330, and that on April 18, 2024 the following resolution was duly adopted by the company:

"Whereas, it is in the best interest of this company to file a voluntary petition in the United States Bankruptcy Court pursuant to chapter 11 of Title 11 of the United States Code;

Be It Therefore Resolved, that Craig J. Morse, CEO of this company, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the company; and

Be It Further Resolved, that Craig J. Morse, CEO of this company, is authorized and directed to appear in all bankruptcy proceedings on behalf of the company, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the company in connection with such bankruptcy case; and

Be It Further Resolved, that Craig J. Morse, CEO of this company, is authorized and directed to employ Jeffrey Klobucar and Cameron Lallier, attorneys and the law firm of Bassford Remele, PA to represent the company in such bankruptcy case."

Executed on: April 22, 2024

Signed: /s/ Craig J. Morse
Craig J. Morse, CEO

LOCAL FORM 1008-1

4892-5867-8455, v. 1

Aaron Burquest
8350 201st Ave NW
Nowthen, MN 55330

Auer Steel
865 Xenium Ln N
Plymouth, MN 55441

Ayd Consulting
9800 Justen Trail N
Grant, MN 55115

Beaudry Oil and Services
630 Proctor Avenue
Elk River, MN 55330

Blue Cross Blue Shield MN
PO Box 860449
Minneapolis, MN 55486

BMO Bank
PO Box 2045
Milwaukee, WI 53201

Cambridge Apartments
320 Edgewood Ave N
Golden Valley, MN 55427

CenterPoint Claims Center
501 West 61st St
Minneapolis, MN 55419

Chase Visa
270 Park Avenue
New York, NY 10017

Collins Brothers Towing
PO Box 405
Elk River, MN 55330

Colonial Life
PO Box 1365
Columbia, SC 29202

Columbia Mngt Services
290 Congress Street
Boston, MA 02110

Comcast Business
1701 John F Kennedy Blvd
Philadelphia, PA 19103

Corr & Main
16195 54th St NE #3350
St. Michael, MN 55376

De Lage Landen Financial Services, Inc.
PO Box 41602
Philadelphia, PA 19101

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101

JNR Adjustment Company
PO Box 27070
Minneapolis, MN 55427

Lethert, Skwira, Schultz & Co LLP
St. Paul, MN 55101

LRS Portables
39578 Grand Ave
North Branch, MN 55056

Mediacom
PO Box 110
Waseca, MN 56093

MidCountry Bank
7825 Washington Ave S #120
Minneapolis, MN 55439

Minnesota Child Support Enforcement
444 Lafayette Road
St. Paul, MT 55155

Minnesota Unemployment Insurance
PO Box 4629
St. Paul, MN 55101

MN Dept of Revenue
PO Box 64564
St. Paul, MN 55164

North Country Chiropractic
964 121st Ln NW
Coon Rapids, MN 55448

Robert Parke
8350 201st Ave NW
Nowthen, MN 55330

SCI Investors LLC
23 N. Main St
Farmington, UT 84025

Super Products LLC
10220 New Decade Dr
Pasadena, TX 77507

Tuff Rodd
6680 Hodgson Rd
Lino Lakes, MN 55014

Vermeer
RDO Trust # 80-5800
PO Box 7160
Fargo, ND 58106

Western National
PO Box 59184
Minneapolis, MN 55459

Wright Hennepin
6800 Electric Drive
Rockford, MN 55373

Xcel Energy Claims
PO Box 47604
Plymouth, MN 55447